

EXHIBIT 14



BELL LEGAL GROUP

M C M L X X X I I I

January 16, 2025

VIA EMAIL -- Hanley.W.Gibbons@usdoj.gov

Hanley W. Gibbons
Trial Attorney
U.S. Department of Justice
Environmental Torts Litigation

Re: In re Camp Lejeune – Expert Reliance Materials – Dr. Kyle Longley

Counsel,

This letter is in response to your January 9, 2025 letter regarding the reliance materials for Dr. Longley's expert report dated December 7, 2024.

As you note, Rule 26 and CMO 17 set out the materials an expert must produce. *See* Fed. R. Civ. P. 26(a)(2)(B); Doc. 305, CMO #17.

Defendant erroneously contends that PLG has not provided all materials related to the declarations and oral histories Dr. Longley cites in his December 7, 2024 report. Dr. Longley cites to the "Oral Historian statement, Retired Master Sergeant Jerry Ensminger," Report pp. 19, 43, and "Oral History via Zoom with Allan Howard, 30 August 2024," Report pp. 10, 32. Defendant subsequently requests all transcripts and recordings. With regard to these calls, Dr. Longley simply asked the individuals questions and put the information directly into his report. Defendant's letter of December 20, 2024 requested that we confirm "that Dr. Longley does not have any notes from phone calls, declarations from plaintiffs or other individuals." PLG can confirm that Dr. Longley does not have any notes under CMO #17, ¶ 3(b). Please note that Dr. Longley has since had additional discussions with Jerry Ensminger as per his expert rebuttal report served January 14, 2025 addressing the Defendant's historian expert, and its reliance list.

As to citations listed by Dr. Longley for which Defendant requests copies or locations of documents, enclosed please find a table listing each citation in question and providing additional information. See attached at **Tab 1**.

Defendant contends that Dr. Longley's Reliance List does not comply with CMO 17 because it does not identify produced documents by bates number. In response, please also see enclosed table, **Tab 1**.

As to back issues of *The Globe*, they can all be accessed publicly on the internet and PLG has previously provided links that allow that access.

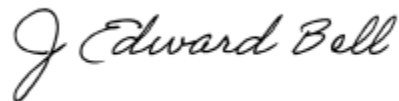
Defendant also states that the PLG has not complied with the requirement of Federal Rule of Civil Procedure 26(a)(2)(B)(v) that expert reports contain “a list of all other cases in which, during the previous 4 years, the witness testified as an expert at trial or by deposition.” Dr. Longley listed a case in Oregon and 17 “Immigration Cases [provided declarations and sometimes testimony on country conditions via Zoom in immigration court in New York, Pennsylvania, New Mexico, and Texas].” Defendant has asked for additional information on the cases. Please see additional information enclosed as **Tab 2**.

Additionally, the links for the two (2) water baby videos are in the process of being uploaded to JEFS.

PLG believes this letter sufficiently responds to Defendant’s deficiency letter dated January 9, 2025 and if Defendant believes further information is necessary, PLG is amenable to a meet and confer.

Respectfully,

Bell Legal Group

A handwritten signature in black ink that reads "J. Edward Bell". The signature is written in a cursive, flowing style.

Ed Bell

Enclosures:

Tab 1 -- List of cited items

Tab 2 -- Information on past Court case

TAB 1 -- Notes on Longley Reliance Materials, 12/7/24 Report

Reliance List No.	Document	Deficiency / Solution
2	"Average Price of a Car in 1965," Worldmetrics, July 24, 2024, https://worldmetrics.org/average-cost-of-a-car-in-1965/ .	<u>Deficiency:</u> The link no longer works for Worldmetrics. <u>Solution:</u> Original cite was to: "Average Price of a Car in 1965," <i>Worldmetrics</i> , July 24, 2024, https://worldmetrics.org/average-cost-of-a-car-in-1965/ [accessed 27 September 2024]. Cite was to support this sentence: "The average price of a car in the 1960s was \$2,650 with additional costs, including \$50/month for insurance, maintenance, and gasoline." A check on the Internet Wayback Machine reflects the Worldmetrics site went offline at the end of 2024. ¹ Accordingly, please see these substitute sources: Micheline Maynard, 'Mad Men' And The Glory Of Mid-1960s Cars, <i>Forbes</i> , March 22, 2012 (in 1960s "[t]he average new vehicle cost \$2,650"). ² See also US Department of Energy, Fact #741: August 20, 2012 Historical Gasoline Prices, 1929-2011 (stating that Average Annual Retail Price of Gasoline for 1965 was 30 cents/gallon). ³
9	The Camp Lejeune Globe, Camp Lejeune, N.C., 2 Aug. 1944.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> Document is publicly available online. ⁴
11	The Camp Lejeune Globe, Camp Lejeune, N.C., 24 April 1952.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> Document is publicly available online. ⁵
12	The Camp Lejeune Globe, Camp Lejeune, N.C., 26 June 1952.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> Document is publicly available online. ⁶
14	The Camp Lejeune Globe, Camp Lejeune, N.C., 8 Oct. 1953.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> Document is publicly available online. ⁷
15	The Camp Lejeune Globe, Camp Lejeune, N.C., 3 May 1957.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> Document is publicly available online. ⁸

¹ https://web.archive.org/web/20241015000000*/https://worldmetrics.org.

² <https://www.forbes.com/sites/michelinemaynard/2012/03/22/mad-men-and-the-glory-of-mid-1960s-cars/#:~:text=The%20average%20new%20vehicle%20cost,assembly%20line%20in%20the%20afternoon>.

³ <https://www.energy.gov/eere/vehicles/fact-741-august-20-2012-historical-gasoline-prices-1929-2011>.

⁴ <https://digital.ncdcr.gov/documents/detail/463294?item=463303>.

⁵ <https://www.dvidshub.net/publication/issues/62695>.

⁶ <https://www.dvidshub.net/publication/issues/62686>.

⁷ <https://www.dvidshub.net/publication/issues/62598>.

⁸ <https://www.dvidshub.net/publication/issues/62383>.

TAB 1 -- Notes on Longley Reliance Materials, 12/7/24 Report

16	The Camp Lejeune Globe, Camp Lejeune, N.C., 10 May 1957.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> Document is publicly available online. ⁹
17	The Camp Lejeune Globe, Camp Lejeune, N.C., 19 May 1960.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> Document is publicly available online. ¹⁰
19	The Camp Lejeune Globe, Camp Lejeune, N.C., Photo, Tarawa Terrace II Track Meet, 8 Feb. 1962.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> Document is publicly available online. ¹¹
20	The Camp Lejeune Globe, Camp Lejeune, N.C., 14 Feb. 1963.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> Document is publicly available online. ¹²
21	The Camp Lejeune Globe, Camp Lejeune, N.C., 11 July 1963.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> Document is publicly available online. ¹³
23	The Camp Lejeune Globe, Camp Lejeune, N.C., 6 Jan. 1966.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> Document is publicly available online. ¹⁴
24	The Camp Lejeune Globe, Camp Lejeune, N.C., 19 May 1966.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> Document is publicly available online. ¹⁵
25	The Camp Lejeune Globe, Camp Lejeune, N.C., 25 Aug. 1966.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> Document is publicly available online. ¹⁶
26	The Camp Lejeune Globe, Camp Lejeune, N.C., 9 March 1967.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> Document is publicly available online. ¹⁷
27	The Camp Lejeune Globe, Camp Lejeune, N.C., 28 July 1967.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> Document is publicly available online. ¹⁸
28	The Camp Lejeune Globe, Camp Lejeune, N.C., 31 Jan. 1969.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> Document is publicly available online. ¹⁹

⁹ <https://www.dvidshub.net/publication/issues/62384>.

¹⁰ <https://www.dvidshub.net/publication/issues/61960>.

¹¹ <https://www.dvidshub.net/publication/issues/61701>.

¹² <https://www.dvidshub.net/publication/issues/61568>.

¹³ <https://www.dvidshub.net/publication/issues/61497>.

¹⁴ <https://www.dvidshub.net/publication/issues/61213>.

¹⁵ <https://www.dvidshub.net/publication/issues/61193>.

¹⁶ <https://www.dvidshub.net/publication/issues/61180>.

¹⁷ <https://www.dvidshub.net/publication/issues/61119>.

¹⁸ <https://www.dvidshub.net/publication/issues/61098>.

¹⁹ <https://www.dvidshub.net/publication/issues/60926>.

TAB 1 -- Notes on Longley Reliance Materials, 12/7/24 Report

29	The Camp Lejeune Globe, Camp Lejeune, N.C., 2 Jan. 1970.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> Document is publicly available online. ²⁰
30	The Camp Lejeune Globe, Camp Lejeune, N.C., 6 Feb. 1970.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> Document is publicly available online. ²¹
31	The Camp Lejeune Globe, Camp Lejeune, N.C., 2 July 1970.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> Document is publicly available online. ²²
35	The Camp Lejeune Globe, Camp Lejeune, N.C., 18 July 1974.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> Document is publicly available online. ²³
37	The Camp Lejeune Globe, Camp Lejeune, N.C., 4 May 1977.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> It appears this citation in the reliance list was mistaken.
38	The Camp Lejeune Globe, Camp Lejeune, N.C., 9 June 1977.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> Document is publicly available online. ²⁴
39	The Camp Lejeune Globe, Camp Lejeune, N.C., 16 June 1977.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> Document is publicly available online. ²⁵
40	The Camp Lejeune Globe, Camp Lejeune, N.C., 30 June 1977.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> Document is publicly available online. ²⁶
41	The Camp Lejeune Globe, Camp Lejeune, N.C., 8 Sept. 1977.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> Document is publicly available online. ²⁷
42	The Camp Lejeune Globe, Camp Lejeune, N.C., 15 Sept. 1977.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> Document is publicly available online. ²⁸
43	The Camp Lejeune Globe, Camp Lejeune, N.C., 29 Sept. 1977.	<u>Deficiency:</u> No bates number provided. <u>Solution:</u> Document is publicly available online. ²⁹
44	The Camp Lejeune Globe, Camp Lejeune, N.C., 6 Oct. 1977.	<u>Deficiency:</u> No bates number provided.

²⁰ <https://www.dvidshub.net/publication/issues/60811>.

²¹ <https://www.dvidshub.net/publication/issues/60806>.

²² <https://www.dvidshub.net/publication/issues/60785>.

²³ <https://www.dvidshub.net/publication/issues/60294>.

²⁴ <https://www.dvidshub.net/publication/issues/60113>.

²⁵ <https://www.dvidshub.net/publication/issues/60112>.

²⁶ <https://www.dvidshub.net/publication/issues/60110>.

²⁷ <https://www.dvidshub.net/publication/issues/60100>.

²⁸ <https://www.dvidshub.net/publication/issues/60099>.

²⁹ <https://www.dvidshub.net/publication/issues/60097>.

TAB 1 -- Notes on Longley Reliance Materials, 12/7/24 Report

		<u>Solution</u> : Document is publicly available online. ³⁰
--	--	--

45	The Camp Lejeune Globe, Camp Lejeune, N.C., 27 Oct. 1977.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. ³¹
46	The Camp Lejeune Globe, Camp Lejeune, N.C., 11 May 1978.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. ³²
49	The Camp Lejeune Globe, Camp Lejeune, N.C., 10 July 1980.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. ³³
50	The Camp Lejeune Globe, Camp Lejeune, N.C., 18 June 1981.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. ³⁴
51	The Camp Lejeune Globe, Camp Lejeune, N.C., 1 July 1981.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. However the cite should be corrected to 7/9/81 not 7/1/81. See report p. 28. ³⁵
52	The Camp Lejeune Globe, Camp Lejeune, N.C., 2 July 1981.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. ³⁶
53	The Camp Lejeune Globe, Camp Lejeune, N.C., 24 June 1982.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. ³⁷
54	The Camp Lejeune Globe, Camp Lejeune, N.C., 5 May 1983.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. ³⁸

³⁰ <https://www.dvidshub.net/publication/issues/60096>.

³¹ <https://www.dvidshub.net/publication/issues/60047>.

³² <https://www.dvidshub.net/publication/issues/59993>.

³³ <https://www.dvidshub.net/publication/issues/59691>.

³⁴ <https://www.dvidshub.net/publication/issues/59564>.

³⁵ <https://www.dvidshub.net/publication/issues/59562>.

³⁶ <https://www.dvidshub.net/publication/issues/59560>.

³⁷ <https://www.dvidshub.net/publication/issues/59412>.

³⁸ <https://www.dvidshub.net/publication/issues/64474>.

TAB 1 -- Notes on Longley Reliance Materials, 12/7/24 Report

55	The Camp Lejeune Globe, Camp Lejeune, N.C., 25 Aug. 1983.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. ³⁹
56	The Camp Lejeune Globe, Camp Lejeune, N.C., 16 Aug. 1984.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. ⁴⁰
57	The Camp Lejeune Globe, Camp Lejeune, N.C., 10 April 1986.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. ⁴¹
58	The Camp Lejeune Globe, Camp Lejeune, N.C., 8 May 1986.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. ⁴²
60	The Camp Lejeune Globe, Camp Lejeune, N.C., 15 Oct. 1987.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. ⁴³
61	The Camp Lejeune Globe, Camp Lejeune, N.C., 4 Aug. 1988.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. ⁴⁴
62	The Camp Lejeune Globe, Camp Lejeune, N.C., 19 July 1990.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. ⁴⁵
107	Email from Charity Delaney to Jason Saunter, 20 Aug. 2014.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : We have this supplemental information: Document: Aug 20 2014 reference FW ATSDR requests for CL voc exposure pathways (ATSDR info_req_062514-1).msg. Bates: CLJA_ATSDR_8RFP_0000000029-30.
108	Email from Charity Delaney to Jason Sautner (ATSDR), 24 July 2014.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document: 23-01054 Item 8.pdf. Bates: CLJA_ATSDR_8RFP_0000000003.

³⁹ <https://www.dvidshub.net/publication/issues/59309>.

⁴⁰ <https://www.dvidshub.net/publication/issues/59243>.

⁴¹ <https://www.dvidshub.net/publication/issues/58868>.

⁴² <https://www.dvidshub.net/publication/issues/58864>.

⁴³ <https://www.dvidshub.net/publication/issues/58564>.

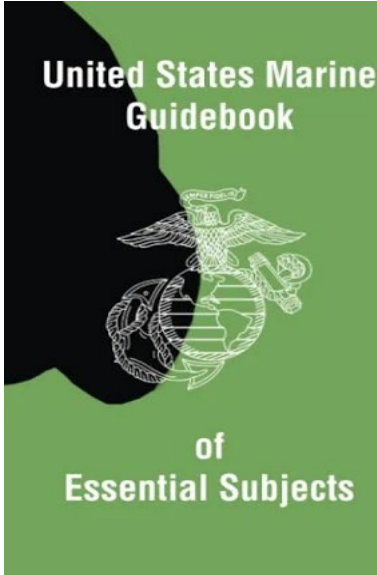
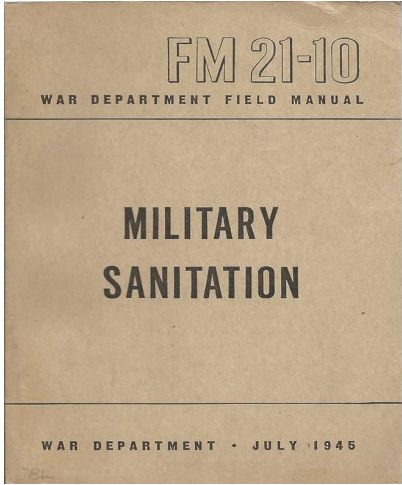
⁴⁴ <https://www.dvidshub.net/publication/issues/63699>.

⁴⁵ <https://www.dvidshub.net/publication/issues/58041>.

TAB 1 -- Notes on Longley Reliance Materials, 12/7/24 Report

112	U.S. Marine Corps, Black Marines Reference Collection, 5958, A/33/K/3/3 Box 3 of 6.	<p><u>Deficiency:</u> Not produced, unable to identify source.</p> <p><u>Solution:</u> The author states that John Lyles, head of the reference center, can provide more information as these are readily available vis-à-vis the finding aid and in the archives themselves. Further, it is noted that the sentence that this cited reference is supporting states: "It was a period of challenges and unrest on bases including Camp Lejeune, as race riots swept the base in July 1969, reflecting divisions in society boiling over during that historical period." For that we suggest the following substitute cites if accessing the primary document proves too difficult: <i>E.g.</i>, see Wikipedia entry: "The Camp Lejeune incident refers to the outbreak of hostilities between black and white enlisted Marines at an NCO Club near the United States Marine Corps' Camp Lejeune in North Carolina, on the evening of July 20, 1969. It left a total of 15 Marines injured, and one, Corporal Edward E. Blankston, dead. It was subsequently investigated by the military and led to widespread changes in military race relations and policy." Available online at https://en.wikipedia.org/wiki/Camp_Lejeune_incident (last accessed Jan. 14, 2025).</p>
119	U.S. Marine Corps, "Master Plan for the Development and Utilization of the Camp Lejeune Area," 24 March 1970 [CLJ0257940].	<p><u>Deficiency:</u> Not a valid bates number.</p> <p><u>Solution:</u> Document: M67001_000367.pdf. Bates: CLJA_LANTDIV-0000041587-41657.</p>
124	U.S. Marine Corps, "United States Marine Guidebook of Essential Subjects," U.S. Marine Corps Institute, 1983.	<p><u>Deficiency:</u> Not produced, unable to locate in public domain.</p> <p><u>Solution:</u> The citation was to support the following text: "A Marine manual emphasized something similar: 'A program of regular, vigorous and progressive physical training results in an increase in work efficiency, self-confidence, and personal as well as unit pride.' The manual argued that cardiovascular training, with a focus on stamina for 'prolonged activity of a moderate tempo,' combined with strength work to manipulate, at the minimum, the weight of the individual ensured longer lives and the 'ability to march long distances with heavy loads or to work long hours and still maintain the reserve to carry on in an emergency.'" To the extent the 1983 document is not available, the facts can be corroborated by oral historians e.g. Ensminger and Partain. The book is available at Amazon with a cover as follows:</p>

TAB 1 -- Notes on Longley Reliance Materials, 12/7/24 Report

		 <p>Available via amazon.com</p>
125	<p>U.S. War Department, "FM 21-10: War Department Field Manual: Military Sanitation." U.S. War Department, 1945.</p>	<p><u>Deficiency:</u> Not produced, unable to locate in public domain. <u>Solution:</u> Document: FM21_10_1945.pdf. Bates: CLJA_ARMYFH_0000000579-832. The document is also available online and has this appearance:</p> 

TAB 1 -- Notes on Longley Reliance Materials, 12/7/24 Report

		Available via amazon.com
126	Wilber, Kendrick, Workman & Warren, Inc., "Fast Food Conceptual Study for Enlisted Dining Facilities: Marine Corps Base, Camp Lejeune, North Carolina," 3 June 1985, 13.	<u>Deficiency:</u> Not produced, unable to locate in public domain. <u>Solution:</u> Document: 5066_0001101-071-001.pdf. Bates: CLJA_WATERMODELING_07-0001287808-1288076.
127	Howard, Allan. Oral History by author via Zoom, 30 Aug. 2024.	<u>Deficiency:</u> Not produced <u>Solution:</u> Dr. Longley spoke with Mr. Howard and wrote the information directly into his report.
143	U.S. Marine Corps, "Nixon's Visit to Camp Lejeune," 30 October 1971, U.S. Marine Corps Film Repository, Research Collections, Univ. of South Carolina.	<u>Deficiency:</u> Not found within specified source. <u>Solution:</u> If the media related to the Nixon visit are not readily available, we can withdraw any reference to the Nixon visit. We note that other documented presidential visits to the base included: "Franklin D. Roosevelt - Dec. 18, 1944. Franklin D. Roosevelt became the first U.S. president to visit Marine Corps Base Camp Lejeune just months before his death from a cerebral hemorrhage at the age of 63... John F. Kennedy - April 14, 1962. John F. Kennedy became the second U.S. president to visit Camp Lejeune when in 1962 he observed units of 2nd Marine Division, 2nd Marine Aircraft Wing and additional troops conduct an amphibious landing demonstration at Onslow Beach. Ronald Reagan - Nov. 4, 1983. On a somber, dreary fall day in 1983, President Reagan attended a memorial service remembering the lives lost in the Oct. 23, 1983 bombing of Marine Corps barracks in Beirut, Lebanon. Calvin Shomaker, U.S. Presidents who visited Camp Lejeune while in office, The Daily News, Sept. 4, 2020, available at https://www.jdnews.com/news/u-s-presidents-who-visited-camp-lejeune-while-in-office/article_38787c91-67f4-5dfc-8ed4-366617b67731.html (last accessed Jan. 14, 2025).
145	U.S. Marine Corps, Photographs of POW Training, P&S: Camp Lejeune, NC-CLNC/POW School, U.S. Marines Archive, Quantico, VA.	<u>Deficiency:</u> Not produced, unable to identify source. <u>Solution:</u> The citation was for this sentence: "Many received training on how to behave if captured, a problem dating back to the Korean War." We hereby withdraw the sentence, as in any event it is not necessary to the report.
148	Oral history, Retired Master Sergeant Jerry Ensminger.	<u>Deficiency:</u> Not produced. <u>Solution:</u> Dr. Longley spoke with Retired Master Sergeant Jerry Ensminger and wrote the information directly into his report.
154	Water babies video (still shots).	<u>Deficiency:</u> Not produced, unable to identify source. <u>Solution:</u> PLG will provide to DOJ a copy of the "water babies" video footage.

TAB 1 -- Notes on Longley Reliance Materials, 12/7/24 Report

[155] Not Identified	Medic Treating Marine with Foot Blisters on page 36 of the Report.	<u>Deficiency:</u> No source or bates provided. <u>Solution:</u> The blisters image is on page 6 of this Globe issue: The Globe, Camp Lejeune, N.C., Vol. 17, No. 42, Oct. 19, 1961, Bates 00897_PLG_0000048348 to 48359. Available also at https://www.dvidshub.net/publication/issues/61746 (last accessed Jan. 14, 2025).
----------------------	--	---

TAB 2

Dr. Kyle Longley Court Cases, Past Four Years (listed in chronological order)

Kyung H. Lee & Joe J. Lee v. Bi-Mart Corporation, May 2024, Portland Oregon. Case involving South Korean nationals and access to U.S. military PXs in Busan, South Korea in the 1970s.

Immigration Cases [provided declarations and sometimes testimony on country conditions via Zoom in immigration court in New York, Pennsylvania, New Mexico, and Texas]

Maria Vasquez (Mexico), Application for Provisional Unlawful Presence Waiver, 26 November 2024. [case from New York City area, defense attorney, Zamir Iosepovici].

Norma Velasquez (Guatemala), Cancellation of Removal, 13 November 2024. [Case from New York City area, defense attorney, Zamir Iosepovici]

Gloria Garcia (Mexico), Cancellation of Removal, 26 October 2024. [case from New York City area, defense attorney, Zamir Iosepovici].

Edward Herrand Caballero (Dominican Republic), asylum case, 22 July 2024. [case from New York City area, defense attorney Michael DiRamundo].

Viridiana Rodriguez (Mexico), Cancellation of Removal, 18 July 2024. [case from New York City area, defense attorney, Zamir Iosepovici]

Eymi Roque (Guatemala), Joint Motion to Reopen and Dismiss Removal Proceedings, 10 July 2024. [case from New York City area, defense attorney, Zamir Iosepovici]

Alejandra Maria Rodriguez-Perez (Honduras), Convention Against Torture (CAT), 2 March 2024. [Case from Texas/New Mexico, defense attorney, Brenda Villalpando]

Andres Salinas-Varon (Colombia), CAT, 29 November 2023. [case from New York City area, defense attorney, The Bronx Defenders]

Luz Dary Novoa (Colombia), CAT, 15 November 2023. [case from New York City area, defense attorney, The Legal Aid Society]

Zonia Roselia Perez Velasquez (Guatemala), CAT, 27 April 2023. [case from New York City area, defense attorney, Zamir Iosepovici]

Jeisson Alfonso Alfonso-Canchala (Colombia), CAT, 5 January 2023. [case from New York City area, defense attorney, The Bronx Defenders]

Angeith Carolina Hincapie-Orozco (Colombia), CAT, 4 September 2022. [case from New York City area, defense attorney Michael DiRamundo].

Lina Marcela Trejos-Yepes (Colombia), CAT, 29 July 2022. [case from New York City area, defense attorney, The Bronx Defenders]

Gerver Geovanny Mateo (Guatemala), CAT, 3 June 2022. [Case from Texas/New Mexico, defense attorney, Brenda Villalpando]

John Arteta (Colombia), CAT, 16 December 2021. [case from New York City area, defense attorney, The Bronx Defenders]

Mariente Rodrigues DaSilva (Brazil), asylum case, 19 September 2021. [case from New York City area, defense attorney Michael DiRamundo].

Segundo Ancelmo Bermeo-Zamaro (Ecuador), Withdrawal of Removal, 8 February 2021. [case from New York City area, defense attorney Paul Grotas]

This listing is based on a reasonable search, and I reserve the right to amend at a future date should it become necessary.